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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company  
☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case, No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF HEARING ON REORGANIZED  
DEBTORS' OBJECTION TO PROOF OF  
CLAIM NO. 58562 FILED BY FULCRUM  
CREDIT PARTNERS LLC AS TRANSFEREE  
OF TUSCAN RIDGE ASSOCIATES, LLC**

**Response Deadline:  
October 26, 2021, 4:00 p.m. (PT)**

**Hearing Information If Timely Response Made:**

Date: November 9, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 **TO: (A) THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**  
2 **JUDGE; (B) THE OFFICE OF THE UNITED STATES TRUSTEE; (C) THE AFFECTED**  
3 **CLAIMANT; AND (D) OTHER PARTIES ENTITLED TO NOTICE:**

4 **PLEASE TAKE NOTICE** that on January 29, 2019 (the “**Petition Date**”), PG&E Corporation  
5 and Pacific Gas and Electric Company, as debtors and reorganized debtors (the “**Debtors**,” or as  
6 reorganized pursuant to the Plan, the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases  
(the “**Chapter 11 Cases**”), each filed a voluntary petition for relief under chapter 11 of title 11 of the  
United States Code (the “**Bankruptcy Code**”) with the United States Bankruptcy Court for the  
Northern District of California (San Francisco Division) (the “**Bankruptcy Court**”).

7 **PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court will hold a hearing on  
8 **November 9, 2021, at 10:00 a.m. (Pacific Time)** (the “**Omnibus Hearing**”) before the Honorable  
Dennis Montali, United States Bankruptcy Judge. Pursuant to the Bankruptcy Court’s *Seventh*  
9 *Amended General Order No. 38 In re: Coronavirus Disease Public Health Emergency*, dated June 28,  
2021, and until otherwise ordered, **all hearings shall be conducted by video or teleconference. The**  
10 **Courtroom will be closed.** All interested parties should consult the Bankruptcy Court’s website at  
www.canb.uscourts.gov for information about Court operations during the COVID-19 pandemic. The  
Bankruptcy Court’s website provides information regarding how to arrange a telephonic or video  
11 appearance. If you have any questions regarding how to appear at a court hearing, you may contact the  
Bankruptcy Court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy  
12 Court’s website.

13 **PLEASE TAKE FURTHER NOTICE** that, in addition to any other matters to be heard at the  
14 Omnibus Hearing, the Bankruptcy Court is scheduled to hear the *Reorganized Debtors’ Objection to*  
*Proof of Claim No. 58562 Filed by Fulcrum Credit Partners LLC as Transferee of Tuscan Ridge*  
15 *Associates, LLC*, filed by the Reorganized Debtors on September 22, 2021 [Dkt. No. 11288] (the  
“**Objection**”). By the Objection, the Reorganized Debtors seek to disallow and expunge Proof of  
16 Claim Number 58562 (the “**Proof of Claim**”), filed by Fulcrum Credit Partners LLC as Transferee of  
Tuscan Ridge Associates, LLC (the “**Claimant**”), on the ground that it seeks amounts for which the  
17 Debtors are not liable. In deciding the Objection, the Court may consider any other document filed in  
these Chapter 11 Cases and related Adversary Proceedings.

18  
19 **FILING AND SERVICE OF RESPONSE:** If the Claimant opposes the disallowance of the  
Proof of Claim referenced above, then the Claimant **MUST** file a response (a “**Response**”), in writing,  
20 with the Bankruptcy Court, and serve it on the counsel for the Reorganized Debtors at  
PGEclaims@kbkllp.com so as to be received by no later than **4:00 p.m. (Pacific Time) on**  
21 **October 26, 2021 (the “Response Deadline”).** The Response must be filed through the Court’s  
electronic case filing (“ECF”) system if the Claimant has access to the ECF system; service on the  
22 Reorganized Debtors’ Counsel will occur automatically upon ECF filing; and no separate service of  
the Response is required. If the Claimant does NOT have access to the ECF system, service must be  
23 made by electronic mail to the Reorganized Debtors’ counsel at PGEclaims@kbkllp.com, and the  
Claimant must arrange for the Response to be filed with the Court within two business days thereafter.  
24 If the Claimant does not have the ability to serve a Response electronically, the Response must be  
served by mail, express or some other means so either (a) it is actually received by the Reorganized  
25 Debtors’ Counsel by the Response Deadline, or (b) it is dispatched not later than the Response  
Deadline through a postal or commercial express service that will make actual delivery not more than  
26 two business days after the Response Deadline, and in that case the Claimant must inform the  
Reorganized Debtors’ counsel by email, telephone or facsimile before the Response Deadline of the  
27 fact that a paper Response is being delivered by express.

1           **Any Response must be accompanied by any declarations or memoranda of law the**  
2           **Claimant wishes to present in support of its position.**

3           **If there is no timely Response, the Bankruptcy Court may enter an order granting**  
4           **the Objection and disallowing and expunging the Proof of Claim by default**  
5           **without a hearing.**

6           **If a timely Response is filed, the Omnibus Hearing will be held at the date and time**  
7           **shown above. If factual disputes are presented by the Objection and the Response,**  
8           **the Omnibus Hearing will proceed as a status conference; factual disputes will not**  
9           **be decided at the Omnibus Hearing, but at a future evidentiary hearing that may**  
10           **be set at the Omnibus Hearing. Issues of a purely legal nature, where facts are not**  
11           **in dispute, may be decided at the Omnibus Hearing. See Bankruptcy Local Rule**  
12           **3007-1.**

13           **PLEASE TAKE FURTHER NOTICE** that copies of the Objection and its supporting papers  
14           can be viewed and/or obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>,  
15           (ii) by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA  
16           94102, or (iii) from the Reorganized Debtors' notice and claims agent, Prime Clerk LLC , at  
17           <https://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based parties;  
18           or +1 (929) 333-8977 for International parties or by e-mail at: [pgeinfo@primeclerk.com](mailto:pgeinfo@primeclerk.com). Note that a  
19           PACER password is needed to access documents on the Bankruptcy Court's website.

20           Dated: September 22, 2021

21                                   **KELLER BENVENUTTI KIM LLP**  
22                                   **GOUGH & HANCOCK LLP**

23                                   By:           /s/ Thomas B. Rupp            
24   Thomas B. Rupp

25                                   *Attorneys for Debtors and Reorganized Debtors*